

KELLOGG, HUBER, HANSEN, TODD, EVANS & FIGEL, P.L.L.C.

SUMNER SQUARE
1615 M STREET, N.W.
SUITE 400
WASHINGTON, D.C. 20036-3215

(202) 326-7900

FACSIMILE:
(202) 326-7999

March 12, 2015

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TW-A325
Washington, D.C. 20554

Electronically Filed

Re: CC Docket No. 95-116; WC Docket No. 09-109

Dear Ms. Dortch:

On March 10, 2015, Lisa Hook, CEO of Neustar, Inc., Leonard Kennedy, Senior Vice President and General Counsel of Neustar, Scott Deutchman, Deputy General Counsel of Neustar, Thomas Navin of Wiley Rein LLP, and I, met with Commissioner Jessica Rosenworcel and Travis Litman of Commissioner Rosenworcel's staff to discuss issues related to the above-captioned dockets.

Our presentation focused on three points. First, we objected to the failure to make the record of the proceeding available to the public and to certain actions by the Wireline Competition Bureau during the proceeding that were not consistent with lawful administrative procedure. That unlawful process has denied the public and interested parties the opportunity to participate meaningfully, and it has left the Commission without a basis for reasoned decision-making. We urged the Commission to make the record of the proceeding public and to seek comment from the many stakeholders that will be affected by a potential change to the United States' principal administrator of numbering services – including not only local number portability but also the routing of virtually every telephone call and text message and a variety of other services provided through the current NPAC.

Second, we urged the Commission to ensure that the costs and risks of a potential transition are fully accounted for before the Commission proceeds with any selection decision. We also urged the Commission to ensure that any order designating a new Administrator protect the public by (1) requiring certification by an independent third party transition manager before any transition be permitted to begin and (2) requiring that fail-back capability to the existing

KELLOGG, HUBER, HANSEN, TODD, EVANS & FIGEL, P.L.L.C.

Ms. Dortch

March 12, 2015

Page 2

NPAC be maintained until after any new Administrator has demonstrated that it is able to provide all NPAC services at the same level of operational effectiveness as the existing NPAC.

Third, we explained that Ericsson is not neutral and impartial as required by Section 251(e) because it is closely aligned with the U.S. wireless industry and is an equipment manufacturer. We noted that Ericsson's subsidiary should be required to comply with all of the same stringent neutrality requirements that Neustar has been required to comply with. And we stated that the use of a voting trust – as was recently proposed in the docket – is not an adequate solution to Ericsson's lack of neutrality and impartiality and is directly contrary to the limits imposed on Neustar by the Commission for years.

Pursuant to Section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, a copy of this letter is being filed via ECFS. If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Aaron M. Panner', with a stylized flourish at the end.

Aaron M. Panner

cc: Commissioner Rosenworcel
Travis Litman